



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone 800-227-8917  
[www.epa.gov/region08](http://www.epa.gov/region08)

**DEC 22 2016**

Ref: 8EPR-N

Mr. Craig Hansen, Superintendent  
Knife River Indian Villages National Historic Site  
U.S. Department of Interior National Park Service  
P.O. Box 9  
Stanton, North Dakota 58571

Re: Knife River Indian Villages National Historic Site Archeological Resources Management  
Plan Draft Environmental Impact Statement; CEQ # 20160255

Dear Mr. Hansen:

The U.S. Environmental Protection Agency Region 8 has reviewed the Knife River Indian Villages National Historic Site Archeological Resources Management Plan Draft Environmental Impact Statement (EIS) prepared by the U.S. Department of the Interior National Park Service (NPS). Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

Based on the EPA's procedures for evaluating potential environmental impacts from proposed actions and the adequacy of the information, the EPA is rating the preferred alternative an "LO" – Lack of Objections. A full description of the EPA's rating system can be found at <http://www2.epa.gov/nepa/environmental-impact-statement-rating-system-criteria>.

**PLAN DESCRIPTION**

The purpose of the archeological resources management plan is to provide a management framework for proactive, sustainable archeological resource protection at the historic site for the next 30 years. Knife River Indian Villages National Historic Site (Knife River) is a 1,748-acre park located at the confluence of the Knife and Missouri rivers in Mercer County northwest of Bismarck, North Dakota. It was established to tell the story of thousands of years of human habitation in North Dakota. There are three large village sites that are the park's primary interpretive sites – Big Hidatsa, Sakakawea and Lower Hidatsa sites.

Four major threats to the archeological resources have been identified. (1) Flooding and riverbank erosion pose the greatest risk, and archeologists have excavated threatened archeological deposits to document resources and preserve data before it is lost to erosion. Erosion also threatens two county roads that run through the area. (2) The northern pocket gopher, plentiful throughout the park, displaces soil and artifacts from chronologically stratified deposits. (3) The encroachment of woody and overgrown vegetation causes displacement of chronological layers, can make areas inaccessible for archeological research and degrades conditions at primary village sites. (4) There are several

infrastructure problems. The maintenance facility creates a visual intrusion in the cultural landscape of the park, particularly at the Big Hidatsa site, and it has been recommended that the facility be relocated. At the visitor center, there are continuing water problems in the basement where the museum collections are stored, creating the potential for mold.

## **ALTERNATIVES**

The NPS considered three alternatives, the no action alternative (Alternative 1) and two action alternatives (Alternatives 2 and 3). Under Alternative 1, management of the archeological resources would continue as currently implemented. Under the two action alternatives, the park staff would manage the resources using an adaptive management framework, an iterative process that would assess the problem, design and implement management actions, monitor over time, evaluate the data, and adjust actions if necessary. This framework would be used to address riverbank erosion, pocket gopher control and vegetation encroachment. Among the tools and techniques that could be used are the following: (1) For river bank stabilization, proposed technologies range from live stakes and vegetated geogrids to retaining walls and drains. (2) Gopher control could include fencing, toxicants or lethal trapping. (3) Vegetation management treatments considered are manual or mechanical treatments, prescribed burning or grazing.

Alternative 2 would relocate the maintenance facility to another location within the park and the existing maintenance building would be removed. If the water problem is not fixed, the museum collection would be moved to a more suitable location onsite. Alternative 3 would relocate the maintenance facility outside the park boundary and, like Alternative 2, would move the museum collection, too, if necessary. Two options for Alternative 3 are either to lease a suitable space or build offsite if none are available for lease.

The NPS's preferred alternative is a combination of Alternatives 2 and 3. The NPS would prefer to locate the maintenance facility offsite utilizing a General Services Administration build-lease arrangement, as proposed in Alternative 3. However, the nearby town of Stanton has a moratorium on construction of new maintenance structures and garages in city limits, the availability of suitable property outside the city limits is unknown, and the influence of the energy industry on the lease market prices in the area probably make this option not feasible. Most likely, the maintenance facility will have to be built within park boundaries, as proposed in Alternative 2.

## **ENVIRONMENTAL ISSUES**

The EPA believes that the NPS has taken a very reasoned approach to evaluating the environmental impacts of the proposed actions in this plan. The NPS demonstrates in this Draft EIS that it is striving to achieve a balance between protecting natural resources and preserving the archeological artifacts central to the reason for the park's creation.

There would be long-term adverse impacts on hydrology until the river stabilizes following implementation of bank stabilization techniques. Impacts to water quality, water resources and wetlands could potentially be significant depending on the ultimate scale and number of bank stabilization projects implemented. However, previous bank stabilization projects have already altered the Knife River within the park and continuation of current park management would result in deterioration of channel morphology, river flows, riverbank conditions, riverine wetlands and water quality. New

impacts would be a result of bank stabilization projects implemented to preserve archeological resources, the purpose and need for this plan. The pocket gopher population within park boundaries could noticeably decline. However, it is not a protected species and thrives throughout the prairie pothole region, so adverse impacts in the surrounding area are not anticipated. Chemicals used for vegetation control would not be applied directly to water resources. If the potential for runoff is high, then nonselective herbicides that meet aquatic use standards would be used.

The EPA appreciates that the NPS has detailed best management practices to protect the natural and cultural resources that could be impacted by the preservation actions they undertake. In addition, we support the NPS for actively consulting with the Indian tribes and initiating formal tribal consultation with the Mandan, Hidatsa, and Arikara Nation; the Apsaalooke Nation; and the Northern Cheyenne Tribe throughout this NEPA process. This document is well written and organized, making it very reader-friendly. It provides the reader with a real sense of place.

Thank you for the opportunity to provide comments on the Knife River Indian Villages National Historic Site Archeological Resources Management Plan Draft EIS. If you have any questions or would like to discuss our comments, please contact me at 303-312-6704 or the lead reviewer of this project, Carol Anderson, at 303-312-6058.

Sincerely,



Philip S. Strobel  
Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

cc by email: Tara Pettit



*Printed on Recycled Paper*